

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY (TRENTON)

Caption in Compliance with D.N.J. LBR 9004-1(b)

Alyk L Oflazian
Manley Deas Kochalski LLC
P.O. Box 165028
Columbus, OH 43216-5028
Telephone: 614-220-5611
Email: ALOflazian@manleydeas.com
Attorney for: PNC Bank, National Association

In Re:

Gerald S. Windos

Case No.: 23-15345-MBK

Chapter: 13

Hearing Date: September 13, 2023

Hearing Time: 09:00 a.m.

Judge: Hon. Michael B. Kaplan

RESPONSE TO MOTION TO SELL REAL PROPERTY (DOCKET # 21)

Now comes PNC Bank, National Association ("Creditor") by and through its attorneys, Manley Deas Kochalski LLC, and responds to the Motion to Sell Real Property filed by Gerald S. Windos ("Debtor") on July 31, 2023 at Docket # 21. Creditor states that Debtor's motion proposes to treat Creditor's claim unfairly by either failing to list the current amount due to pay Creditor's claim in full or by proposing a sale price insufficient to satisfy Creditor's lien.

Creditor does not oppose the Motion if:

1. Creditor's lien is paid in full.
2. The current payoff amount good through August 17, 2023 is \$1,069,081.40.
3. Debtor's counsel requests a payoff quote from Creditor to ensure its lien is paid no sooner than 7 days prior to closing.
4. If Creditor's lien is not paid in full, any short sale shall be contingent on written approval from Creditor.
5. The sale shall occur no more than 120 days from the date the order is entered.

6. If the sale is later than 120 days from the date the order is entered, Debtor shall file a new motion with the court with updated terms of sale.

WHEREFORE, Creditor respectfully requests that the motion be denied.

Respectfully submitted,

/s/Alyk L. Oflazian

Alyk L Oflazian (042142011)

Attorney for Creditor

Manley Deas Kochalski LLC

P.O. Box 165028

Columbus, OH 43216-5028

Telephone: 614-220-5611

Fax: 614-627-8181

Contact email is amps@manleydeas.com

CERTIFICATE OF SERVICE

I certify that on the date of filing, a copy of the foregoing Response to Motion to Sell Real Property was filed electronically. Notice of this filing will be sent to the following parties through the Court's Electronic Case Filing System:

Office of U.S. Trustee, Party of Interest, (Registered address)@usdoj.gov

Albert Russo, docs@russotrustee.com

Monika Mazurczyk, Attorney for Gerald S. Windos, monikam@tomeslawfirm.com

I certify that on the date of filing, a copy of the foregoing document was sent by U.S. Mail to the following:

Gerald S. Windos, 74 Robins Place, Metuchen, NJ 08840

Shelley Windos, 74 Robins Pl, Metuchen, NJ 08840

/s/Alyk L. Oflazian
